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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANDRE DUBUS III, SUSAN ORLEAN,

Individually and on behalf of all others
similarly situated,

v.

NVIDIA Corporation, a Delaware corporation;
Defendant.

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SULLIVAN, LLP

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Attorneys for Defendant NVIDIA Corporation

Case No. 4:24-cv-02655-JST

**JOINT STIPULATION TO EXTEND TIME
TO RESPOND TO COMPLAINT**

Judge: Hon. Jon S. Tigar
Courtroom: 6 – 2nd Floor

Action Filed: May 2, 2024

Pursuant to Civil Local Rule 6-1, Plaintiffs Andre Dubus III and Susan Orlean (collectively, "Plaintiffs") and Defendant NVIDIA Corporation ("Defendant" or "NVIDIA") (collectively, the "Parties"), by and through their respective counsel of record hereby stipulate the following:

1. WHEREAS, Plaintiffs filed the Complaint in this action on May 2, 2024 (ECF No. 1);

2. WHEREAS, NVIDIA was served with Plaintiffs' Complaint on May 10, 2024 (ECF No. 15);

3. WHEREAS, NVIDIA's time to move, answer, or otherwise respond to Plaintiffs' Complaint is May 31, 2024 (ECF No. 15);

4. WHEREAS, the Court judicially related this action to *Nazemian v. NVIDIA Corporation*, 24-cv-01454-JST, on May 29, 2024 (*Dubus* ECF No. 17);

5. WHEREAS, the *Dubus* Plaintiffs anticipate that Plaintiffs in both actions are likely to move to consolidate the two actions and file a consolidated amended complaint;

6. WHEREAS, NVIDIA has requested, and Plaintiffs have agreed to, an extension of NVIDIA's time to respond to Plaintiffs' Complaint by thirty (30) days; and

7. WHEREAS, this additional time for NVIDIA to respond will not alter the date of any event or deadline already fixed by the Court, is made in good faith and not for the purposes of any delay, enhances judicial efficiency in light of the possible consolidation motion, and will not prejudice any party or the Court;

NOW, THEREFORE IT IS HEREBY STIPULATED, by and between the Parties and their respective counsel, that NVIDIA shall answer or otherwise respond to Plaintiffs' Complaint by July 1, 2024, unless mooted by the filing of an amended consolidated complaint.

Dated: May 31, 2024

Respectfully submitted,

By: /s/ Sean S. Pak

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14 Dated: May 31, 2024

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ATTESTATION PURSUANT TO CIVIL L.R. 5-1

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: May 31, 2024

By: /s/ Sean S. Pak
Sean S. Pak